

# CIPRIANI & WERNER

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September 19, 2019

**VIA FACSIMILE (856-757-5355)**

Hon. Robert B. Kugler  
United States District Court  
for the District of New Jersey  
U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

Hon. Joel Schneider  
United States District Court  
for the District of New Jersey  
U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**RE: *In re Valsartan Products Liability Litigation***  
**No. 1:19-md-02875-RBK-JS (D.N.J.)**

Dear Judge Kugler and Magistrate Judge Schneider:

I represent Defendants Aurobindo Pharma USA, Inc. ("Aurobindo USA") and Aurolife Pharma LLC ("Aurolife") in MDL 2875. I submit this letter to Your Honors with the consent of counsel for Plaintiffs and Hetero USA, Inc. in support of their joint request to modify dates in Case Management Order No. 12 ("CMO-12").

On September 9, 2019, Plaintiffs counsel contacted defense counsel requesting an extension to serve the Rule 30(b)(6) notices through the close of business on September 10, 2019. The Parties (Plaintiffs, Aurobindo USA, Aurolife, and Hetero USA, Inc.) were able to reach an agreement to extend all deadlines in Paragraph 2 of CMO-12. Based on that agreement, we submit this joint request that all deadlines in Paragraph 2 of CMO-12 be modified to read as follows:

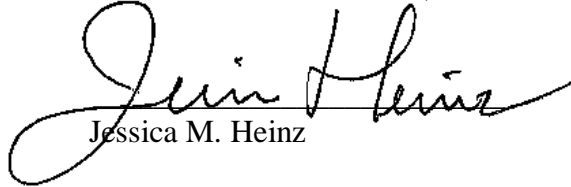
The deposition notices shall be served by **September 10, 2019**. Any objections shall be served by **October 4, 2019**. Any disputes shall be presented to the Court to be decided at the **October 9, 2019** teleconference. The noticed depositions shall be taken before **November 8, 2019**. Plaintiffs are granted leave to file motions to compel discovery, to be filed no later than **November 22, 2019**.

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Hon. Joel Schneider  
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Thank you very much for your consideration.

Respectfully,

**CIPRIANI & WERNER, P.C.**



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